

1 GEORGE P. KELESIS, ESQ.  
2 Nevada Bar No. 000069  
3 COOK & KELESIS, LTD.  
4 517 South Ninth Street  
5 Las Vegas, Nevada 89101  
6 Phone: (702) 737-7702  
7 Fax: (702) 737-7712a  
8 E-mail: [gkelesis@bckltd.com](mailto:gkelesis@bckltd.com)

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10 Sunethra Muralidhara  
11 Nevada State Bar No. 13549  
12 Wright Marsh & Levy  
13 300 S. Fourth St. Ste. 701  
14 Las Vegas, Nevada 89101  
15 (702) 382-4004  
16 [smuralidhara@wmllawlv.com](mailto:smuralidhara@wmllawlv.com)  
17 Attorneys for Mr. Raul Gil

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 UNITED STATES OF AMERICA,

21 Case No.: 2:22-cr-00147-APG-EJY

22 Plaintiff,

23 v.

24 RAUL GIL,

25 **STIPULATION TO CONTINUE**  
**SENTENCING**  
**(Fourth Request)**

26 Defendant.

27  
28 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
United States Attorney, Eric C. Schmale, Assistant United States Attorney, Thomas W. Flynn,  
Trial Attorney, Tax Division, as counsel for the United States of America, and George P. Kelesis  
and Sunethra Muralidhara, as counsel for the defendant, Raul Gil, that the sentencing in the above-  
captioned matter, currently scheduled for June 15, 2023 at 9:30 AM, be vacated and continued to

1 August 31, 2023 at 10:00 AM.<sup>1</sup>

2 This Stipulation is entered into for the following reasons:

3 1. Defendant is out of custody and does not object to the continuance.

4 2. Lead counsel for the Defendant, Raul Gil, recently received notice that a grand jury

5 subpoena has been issued in an unrelated matter that will necessitate counsel's

6 presence in another jurisdiction on the date set for sentencing in this matter.

7 3. In addition, counsel for defendant has been experiencing cardiac episodes with

8 increasing frequency and has been advised to avoid stress as much as possible until

9 surgery to address the issue is performed.

10 4. Counsel for defendant is scheduled for heart surgery in mid-July which will require 7

11 days complete bedrest and a period of 4-6 weeks rehabilitation thereafter.

12 5. The parties need additional time to determine their positions regarding sentencing,

13 gather and prepare support for their positions, file sentencing memoranda, and prepare

14 for argument.

15 6. Counsel for the government agrees to the continuance.

16 7. The additional time requested by this Stipulation is made in good faith and not for

17 purposes of delay.

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26 <sup>1</sup> Date and time provided by judicial staff and has been confirmed as available by all

27 counsel.

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1 This is the fourth request for continuation of the sentencing hearing.  
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3 DATED this 1st day of June 2023.  
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5 JASON M. FRIERSON  
6 UNITED STATES ATTORNEY  
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8 COOK & KELESIS, LTD.  
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10 By: /s/ George P. Kelesis  
11 GEORGE P. KELESIS, ESQ.  
12 Nevada Bar No. 000069  
13 *Counsel for Defendant Gil*  
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15 By: /s/ Thomas W. Flynn  
16 THOMAS W. FLYNN  
17 Trial Attorney  
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19 /s/ Sunethra Muralidhara  
20 Sunethra Muralidhara  
21 Nevada Bar No. 013549  
22 *Counsel for Defendant Gil*  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No.: 2:22-cr-00147-APG-EJY

Plaintiff,

V.

RAUL GIL,

Defendant.

**ORDER CONTINUING  
SENTENCING HEARING**

Based on the Stipulation of counsel and for good cause appearing, the Court hereby continues the sentencing of Defendant Raul Gil in this matter. The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendant in a speedy sentencing because:

1. Defendant is out of custody and does not object to the continuance.

2. Lead counsel for the Defendant, Raul Gil, recently received notice that a grand jury subpoena has been issued in an unrelated matter that will necessitate counsel's presence in another jurisdiction on the date set for sentencing in this matter.

3. In addition, counsel for defendant has been experiencing cardiac episodes with increasing frequency and has been advised to avoid stress as much as possible until surgery to address the issue is performed.

4. Counsel for defendant is scheduled for heart surgery in mid-July which will require 7 days complete bedrest and a period of 4-6 weeks rehabilitation thereafter.

1       5.     The parties need additional time to determine their positions regarding sentencing,  
2 gather and prepare support for their positions, file sentencing memoranda, and prepare for  
3 argument.  
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5       6.     Counsel for the government agrees to the continuance.  
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7       IT IS THEREFORE ORDERED that the sentencing in the above-captioned matter,  
8 currently scheduled for June 15, 2023 at 9:30 AM is vacated and continued to the 31<sup>st</sup> day of  
9 August, 2023 at the hour of 10:00 AM.  
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11       HONORABLE ANDREW P. GORDON  
12       UNITED STATES DISTRICT JUDGE  
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14       Dated: June 2, 2023  
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